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Attorney for Plaintiff, Demetrious Polychron

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

DEMETRIOUS POLYCHRON

Plaintiff,

vs.

JEFF BEZOS, et al.,

Defendants.

Case No.: 2:23-cv-02831-SVW-E

**KATIE CHARLESTON'S
MOTION TO WITHDRAW
APPEARANCE**

Hearing Date: October 2, 2023

Hearing Time: 1:30pm

Complaint filed: April 4, 2023

Amended Complaint Filed: July 13,
2023

KATIE CHARLESTON'S MOTION TO WITHDRAW APPEARANCE

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 2, 2023, at 1:30 p.m. or as soon as may be heard in Courtroom 10A of the United States District Court for the District of California, First Street Courthouse, 350 West First Street, Los Angeles, California 90012, Katie Charleston of Katie Charleston Law, PC, will and hereby does move this Court for an order granting her withdrawal of appearance on behalf of Plaintiff, Demetrious Polychron.

This motion is based on this notice of motion, the declaration of Katie Charleston, and all other matters of which this Court may take judicial notice, the pleadings, files, and records in this action, and on any argument heard by this Court.

This notice is made following the undersigned's notice of intent to withdraw sent to Plaintiff on August 23, 2023 and again on August 28, 2023.

Dated: August 31, 2023

Respectfully submitted,

Katie Charleston Law, PC

By: /s/ Katie Charleston

Katie Charleston, Esq.

1 Katie Charleston, of Katie Charleston Law, PC, respectfully requests the Court
2 withdraw her appearance as counsel of record for Plaintiff, Demetrious Polychron, and in
3 support thereof states:

4 1. There has been a significant breakdown in the attorney-client relationship in
5 that Plaintiff has become unresponsive to the undersigned's multiple attempts at contact.
6 (Katie Charleston Decl. at ¶ 2, filed contemporaneously herewith).

7 2. On August 21, 2023, the undersigned attempted to reach Plaintiff via
8 telephone and email, and no response was received. (Charleston Decl. at ¶ 3).

9 3. On August 28, 2023, the undersigned attempted to reach Plaintiff via phone
10 and email, and no response was received. (Charleston Decl. at ¶ 4).

11 4. On August 29, 2023, the undersigned attempted again to reach Plaintiff via
12 his client portal to approve a pleading, and no response was received. (Charleston Decl.
13 at ¶ 5).

14 5. On August 30, 2023, the undersigned's staff again attempted to contact
15 Plaintiff via telephone regarding upcoming deadlines and the upcoming hearing date.
16 (Charleston Decl. at ¶ 6).

17 6. The undersigned has continued to secure Plaintiff's interests by conferring
18 with opposing counsel and notifying Plaintiff as needed, despite Plaintiff's continued
19 failure to respond and lack of cooperation. (Charleston Decl. at ¶ 7).

20 7. Plaintiff has been notified and is aware of the September 25, 2023, appellate
21 deadline relating to this Court's entry of Judgment on August 25, 2023. (Charleston Decl.
22 at ¶ 8).

23 8. Plaintiff has been notified and is aware of the Defendants' September 8,
24 2023, filing deadline for their attorney fee motions. (Charleston Decl. at ¶ 9).

25 9. Further, Plaintiff has failed to provide payment for services rendered to the
26 undersigned in this and a related case for over two months. (Charleston Decl. at ¶ 10).

27 10. The undersigned can no longer represent Plaintiff due to the foregoing
28 reasons and the breakdown of the attorney-client relationship.

1 WHEREFORE, Katie Charleston respectfully requests the Court enter an order
2 withdrawing her appearance as counsel of record for Plaintiff, Demetrious Polychron, and
3 for all other proper relief.

4 Dated: August 31, 2023

Respectfully submitted,
Katie Charleston Law, PC

7 By: /s/ Katie Charleston
Katie Charleston, Esq.
Attorney for Plaintiff